



Bowles&Johnson

April 13, 2022

By ECF

Hon. Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Denson v. Donald J. Trump for President, Inc., No. 20 Civ. 4737 (S.D.N.Y.)**  
**Joint Schedule Regarding Class Certification Discovery**

Dear Judge Gardephe:

We represent Lead Plaintiff Jessica Denson and the putative plaintiff class in the above-captioned matter, and we file this letter jointly with counsel for defendant Donald J. Trump for President, Inc. (the “Campaign”), as ordered in the Court’s March 30, 2022 decision and order. Plaintiff and the Campaign jointly and respectfully present the following discovery schedule for the Court’s consideration.

- 1) The parties must complete fact discovery no later than July 29, 2022.
- 2) Under the Order’s interim deadlines, the parties must:
  - a) Serve initial request for production of documents on May 4, 2022.
  - b) Serve initial interrogatories on May 4, 2022.
  - c) Complete depositions of fact witnesses by July 29, 2022.
    - i) Unless the parties agree or the Court so orders, the parties may not hold depositions until all parties have responded to initial requests for document production.
    - ii) There is no priority in deposition by reason of a party’s status as plaintiff or defendant.
    - iii) Unless the parties agree or the Court so orders, non-party depositions must follow initial party depositions.
    - iv) Consistent with Federal Rule of Civil Procedure 30(d), the parties may not extend depositions beyond one business day without prior leave of the Court.
  - d) Serve initial requests to admit no later than July 14, 2022.
- 3) The parties agree that there will be no expert discovery.

David K. **Bowles**

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Counsel for both parties appreciate the Court's attention to these matters.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "DKB".

David K. Bowles  
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